FEET

CORRES. CONTROL INCOMING LTH NO.

DUE DATE 2

ACTION DIST BENEDETTI, R.L BENJAMIN. A BERMAN, H.S CARNIVAL, G.J COPP. R.D. DAVIS, J.G. FERRERA, D.W. FRANZ. W.A. HANNI, B.J. HEALY, T.J. HEDAHL, T.G HILBIG, J.G. HUTCHINS, N.M. KIRBY, W.A KUESTER, A.W MAHAFFEY, J.W. MANN, H.P. MORGAN, R.V. POTTER, G.L. SATTERWHITE, D.C SCHUBERT, AL SETLOCK, G.H. SULLIVAN, M.T. SWANSON, E.R. WILKINSON, R.B WILSON, J.M. Stiger Anderson Lee -Valdez

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Reviewed for Addressee Corres, Control RFP

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CORRESPONDENCE CONTROL

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Department of Energy

Rocky Flats Office

FEB 0 9 1994

ER:SRG:01233

States Government

Expedited Action at Operable Unit No. 2

Sue Stiger, Associate General Manager Environmental Restoration Management EG&G Rocky Flats, Inc.



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In our November 19, 1993, memorandum (ERD:SRG:12422), we informed EG&G of our commitment to the Environmental Protection Agency (EPA) and the Colorado Department of Health (CDH) to streamline administrative processes and take early action at Operable Unit (OU) No. 2 (903 Pad, Mound, and East Trenches) in Individual Hazardous Substance Site 110. We indicated in this memorandum that a lot is at stake if Rocky Flats cannot demonstrate the ability to take expedited actions.

The information we have received to date indicates that what we view as a three-month action is still planned to take two years. The proposals contained in the EG&G December 17, 1993, letter (93-RF-13680; NMH-656-93) and presented in the meeting held with your staff held January 19, 1994, are unacceptable because of the long timeframe.

We foresee a phased action at Individual Hazardous Substance Site (IHSS) that would begin immediately after the OU-2 Subsurface Interim Measure/Interim Remedial Action (IM/IRA) soil vapor extraction testing at IHSS 110 (scheduled to be completed in mid-May 1994). The approach should be a creative, pro-active solution, within the framework and spirit of the National Contingency Plan.

The EPA and CDH have expressed displeasure that we have not met with them about our proposed expedited action. We have been given indications from EPA and CDH that failure to initiate an "early" action will have a direct and negative impact on the Interagency Agreement schedules. We have also been given preliminary indications from EPA and CDH that they will set an enforceable milestone for startup of the expedited action at the end of test 1 of the Soil Vapor Extraction (SVE) Subsurface IM/IRA

You are requested to evaluate the following criteria: (1) the action is expedited and begins at the end of SVE test 1, (2) the action can be phased to incorporate the "observational approach," and (3) treatability studies to treat removed materials are considered. There may still be the possibility to propose an alternate location to the one at IHSS 110. This has been discussed with staff on numerous occasions and would appreciate your response expeditiously, by February 11, 1994.

FEB 0 9 1994

S. Stiger ER:SRG:01233

If you have any questions, please direct them to Scott Grace of my staff at extension 7199.

Martin H. McBride Acting Assistant Manager Environmental Restoration

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